

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	FILE UNDER SEAL
)	
v.)	CRIMINAL No.2:20-cr-20148-SHL
)	
)	18 U.S.C. §666
KATRINA ROBINSON,)	18 U.S.C. §981
)	
)	18 U.S.C. §1343
Defendant.)	28 U.S.C. §2461
)	

SUPERSEDING INDICTMENT

THE GRAND JURY CHARGES:

Introduction and Scheme to Defraud

1. During all times material to this Indictment:
 - a. The Healthcare Institute LLC ("THI") was a Tennessee Corporation registered with the State of Tennessee as a domestic, for-profit corporation, and located at 7253 Winchester Rd., Memphis, Tennessee.
 - b. THI was a healthcare education provider, offering training programs in certified nursing assistance (CNA), phlebotomy, and Licensed Practical Nursing (LPN).
 - c. Defendant **KATRINA ROBINSON** was Director and beneficial owner of THI.

d. The Health Resources and Services Administration (HRSA) was a division of the United States Department of Health and Human Services, a department of the U.S. government.

e. The Geriatrics Workforce Enhancement Program was a federal grant program administered by HRSA, which awarded federal grant funds to educational institutions for the purpose of promoting education in order to fill a need for healthcare professionals in the field of geriatric care.

f. Regions Bank was a financial institution headquartered in Birmingham, Alabama whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

g. Pinnacle Bank was a financial institution headquartered in Nashville, Tennessee whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC).

2. On or about March 20, 2015, **KATRINA ROBINSON**, on behalf of THI, submitted a grant application to HRSA requesting funding under the Geriatrics Workforce Enhancement Program over what was ultimately an approximate four-year period beginning July 1, 2015.

3. On or about June 29, 2015, HRSA provided **KATRINA ROBINSON** with a Notice of Award approving THI for funding under the Geriatrics Workforce Enhancement Program. The notice, which was subsequently renewed for one-year periods on or about June 29 of each year between 2016 and 2018, contained detailed stipulations as to how the grant funds could be spent, including specific amounts for each approved category of expenditure, such as employee compensation. THI continued to receive funding

payments from HRSA under these award notices through on or about June 13, 2019, and received total funding from HRSA in excess of \$2.2 million.

4. Thus, THI received in excess of \$10,000 in federal grant funds under the HRSA Geriatrics Workforce Enhancement Program during any given one-year period between January 1, 2015 and December 31, 2019.

5. Beginning on or about July 1, 2015 and continuing until on or about June 30, 2019, defendant **KATRINA ROBINSON** executed a scheme and artifice to defraud, and to obtain money and property belonging to THI through embezzlement, theft, intentional misapplication, and knowing conversion without lawful authority by means which included, but were not limited to the following:

Manner and Means

6. It was part of the scheme that **ROBINSON**, as Director of THI, would pay herself compensation that was either not approved, or was in excess of what was approved, under the terms of the HRSA grant, including excess salary, a lump sum performance payout, and a lump sum payment for the purpose of establishing an individual retirement account (IRA) for her benefit. Thus, these payments to **ROBINSON** did not constitute bona fide salary, wages, fees, or other compensation paid or reimbursed in the usual course of business, as provided in 18 U.S.C. §666(c).

7. It was part of the scheme that **ROBINSON** would use THI funds for a large number of personal expenditures. Those funds were either debited directly from THI's primary operating account at Regions Bank in check, debit card, or ACH or other electronic transactions; from a savings account at Regions Banks owned by THI; or were

conducted using a THI credit card which was repaid using THI funds. The items involved in these transactions include, but are not limited to, the following:

- a. One parcel of real property located at 4422 Boeingshire Drive, Memphis, Tennessee;
- b. One 2016 Jeep Renegade, VIN ZACCJABT9GPD91905;
- c. Clothing, accessories, and hair and beauty products;
- d. Expenses related to **ROBINSON's** wedding and honeymoon;
- e. Other personal travel and entertainment;
- e. Home electronics;
- f. Improvements to **ROBINSON's** personal residence;
- g. Payments on **ROBINSON's** personal credit cards, store charge cards, student loans, and other personal loans;
- h. Construction, rent, utilities, security services, equipment, and supplies for Celebrity Body Studio, a body aesthetics business owned by **ROBINSON** and unrelated to THI and its mission;
- i. Equipment and supplies for a snow cone business operated by **ROBINSON's** children;
- j. Legal fees for **ROBINSON's** divorce;
- k. Expenses related to a campaign event at TPC Southwind for **ROBINSON's** Tennessee State Senate campaign.

8. It was part of the scheme that **ROBINSON** would make fraudulent misrepresentations to representatives of HRSA concerning THI, its operations and educational programs, including, but not limited to:

a. Representing to HRSA in periodic reporting that THI, its operations and programs remained unchanged from what was represented in its initial grant application to HRSA, well knowing that **ROBINSON** was paying herself compensation in excess of what was contemplated in the original application and approved under the terms of the grant, and was diverting a significant amount of THI funds to her own personal use.

b. Representing to HRSA that certain individuals were students and/or graduates of THI's educational programs, well knowing that those individuals were neither current students nor graduates.

9. It was part of the scheme that, using the manner and means described in paragraphs 6-8 above, **ROBINSON** obtained money and other property valued at no less than \$600,000.00.

COUNT 1
(Theft and Embezzlement Involving Government Programs)

The allegations in paragraphs 1-9 above are hereby realleged and incorporated by reference as if fully set forth herein.

Between on or about July 1, 2015 and on or about June 30, 2016, in the Western District of Tennessee and elsewhere, the defendant

KATRINA ROBINSON

being an agent of an organization receiving benefits in excess of \$10,000 during the one-year period between July 1, 2015 and June 30, 2016 under the Geriatrics Workforce Enhancement Program administered by the U.S. Dept. of Health and Human Services, Health Resources and Services Administration, embezzled, stole, obtained by fraud, knowingly converted without authority to the use of a person not the rightful owner, and

intentionally misapplied property worth at least \$5,000 and owned by, and under the care, custody, and control of such organization, that is, United States funds in the amounts set forth below paid to the payees set forth below for the general purposes set forth below:

Begin Date	End Date	Payee	Amount	Description
07/01/2015	04/12/2016	Lowes Co.	\$ 4,240.63	Building supplies
07/08/2015	04/25/2016	Best Buy	\$ 5,968.95	Electronics
07/30/2015	06/20/2016	Paypal	\$ 6,451.00	Clothing, shoes, hair/beauty products, spa supplies
08/26/2015	N/A	Capital One	\$ 2,322.07	Payment on personal credit card
11/16/2015	02/23/2016	Home Depot	\$ 303.42	Building supplies
01/27/2016	04/15/2016	Wells Fargo Bank NA	\$ 2,128.24	Payments on personal credit card
02/22/2016	N/A	Surplus Warehouse	\$ 111.28	Building supplies
03/31/2016	05/31/2016	Bookit.com	\$ 5,294.93	Travel to Jamaica
08/26/2015	N/A	Barclays Bank PLC	\$ 1,388.78	Payment on personal credit card
07/06/2015	N/A	TJX Rewards	\$ 967.00	Payment on personal TJ Maxx charge card
07/29/2015	02/08/2016	Ross Stores	\$ 248.05	Clothing and home décor
08/04/2015	N/A	Carnival Cruise Lines	\$ 856.10	Cruise
08/10/2015	N/A	Dillards	\$ 458.27	Clothing
12/21/2015	N/A	Floor n Decor	\$ 118.04	Home flooring and furnishings
01/13/2016	N/A	Lexus of Memphis	\$ 65.69	Personal auto repair
02/27/2016	03/25/2016	Triumph Media Works/Antoine Beane	\$ 1,350.00	Wedding videography
03/05/2016	N/A	One Main Financial	\$ 3,744.07	Payment on personal loan
04/02/2016	06/21/2016	Southaven Party Rentals	\$ 2,286.00	Wedding party rental
04/02/2016	N/A	GP Entertainment	\$ 2,326.01	Performing artist booking agency
06/21/2016	N/A	Facegyrl	\$ 1,158.05	Wedding makeup artist

06/26/2016	N/A	Madison Hotel, Memphis	\$ 972.28	Lodging
		Total	\$42,758.86	

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNT 2
(Theft and Embezzlement Involving Government Programs)

The allegations in paragraphs 1-9 above are hereby realleged and incorporated by reference as if fully set forth herein.

Between on or about July 1, 2016 and on or about June 30, 2017, in the Western District of Tennessee and elsewhere, the defendant

KATRINA ROBINSON

being an agent of an organization receiving benefits in excess of \$10,000 during the one-year period between July 1, 2016 and June 30, 2017 under the Geriatrics Workforce Enhancement Program administered by the U.S. Dept. of Health and Human Services, Health Resources and Services Administration, embezzled, stole, obtained by fraud, knowingly converted without authority to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by, and under the care, custody, and control of such organization, that is, United States funds in the amounts set forth below paid to the payees set forth below for the general purposes set forth below:

Begin Date	End Date	Payee	Amount	Description
07/25/2016	06/15/2017	Lowes Co.	\$ 2,958.05	Building supplies
08/09/2016	06/19/2017	Best Buy	\$ 4,138.80	Electronics
07/20/2016	06/22/2017	Paypal	\$ 8,955.25	Clothing, shoes, hair/beauty products, spa supplies
07/19/2016	05/23/2017	Capital One	\$ 3,950.31	Payments on personal credit card

03/23/2017	06/09/2017	Home Depot	\$ 7,772.60	Building supplies
07/25/2016	N/A	Wells Fargo Bank NA	\$ 1,000.00	Payment on personal credit card
06/06/2017	06/13/2017	Surplus Warehouse	\$ 5,199.63	Building supplies
08/15/2016	05/11/2017	Amazon.com, Inc.	\$ 7,441.81	Clothing, hair/beauty products, home theatre equipment
12/16/2016	N/A	Methodist Healthcare FCU	\$ 9,965.52	Payment on personal loan
04/13/2017	06/14/2017	Cesar Herrera	\$20,260.00	Construction/remodeling work at Celebrity Body Studio
04/17/2017	N/A	Memphis Grizzlies	\$ 1,000.00	Game tickets, seats for other FedEx Forum events, space rental for children's concession business
04/20/2017	N/A	MMIC/Malkin Management	\$ 1,000.00	Rent for Celebrity Body Studio
05/19/2017	N/A	Great Lakes Student Loans	\$ 2,492.70	Payments on personal student loan
10/20/2016	06/15/2017	At Home	\$ 1,329.83	Home furnishings and décor
01/05/2017	01/24/2017	Ann Taylor	\$ 446.79	Clothing
08/29/2016	05/17/2017	Ross Stores	\$ 357.80	Clothing and home décor
01/03/2017	N/A	Barclays Bank PLC	\$ 556.36	Payment on personal credit card
10/03/2016	N/A	TJX Rewards	\$ 1,427.17	Payment on personal TJ Maxx charge card
05/11/2017	06/08/2017	Floor n Décor	\$ 1,227.37	Home flooring and furnishings
05/04/2017	07/13/2017	Lexus of Memphis	\$ 1,635.86	Personal auto repair
		Total	\$ 83,115.85	

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNT 3
(Theft and Embezzlement Involving Government Programs)

The allegations in paragraphs 1-9 above are hereby realleged and incorporated by reference as if fully set forth herein.

Between on or about July 1, 2017 and on or about June 30, 2018, in the Western District of Tennessee and elsewhere, the defendant

KATRINA ROBINSON

being an agent of an organization receiving benefits in excess of \$10,000 during the one-year period between July 1, 2017 and June 30, 2018 under the Geriatrics Workforce Enhancement Program administered by the U.S. Dept. of Health and Human Services, Health Resources and Services Administration, embezzled, stole, obtained by fraud, knowingly converted without authority to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by, and under the care, custody, and control of such organization, that is, United States funds in the amounts set forth below paid to the payees set forth below for the general purposes set forth below:

Begin Date	End Date	Payee	Amount	Description
08/30/2017	02/05/2018	Lowes Co.	\$ 1,238.96	Building supplies
07/06/2017	04/13/2018	Best Buy	\$ 4,858.08	Electronics
07/03/2017	05/29/2018	Paypal	\$ 10,500.22	Clothing, shoes, hair/beauty products, spa supplies
07/24/2017	01/17/2018	Capital One	\$ 7,312.96	Payments on personal credit card
07/26/2017	09/26/2017	Home Depot	\$ 1,050.41	Building supplies
08/02/2017	12/11/2017	Wells Fargo Bank NA	\$ 4,199.68	Payments on personal credit card

08/07/2017	06/29/2018	Amazon.com, Inc.	\$ 7,514.53	Clothing, hair/beauty products, home theatre equipment
07/06/2017	N/A	Cesar Herrera	\$ 2,270.00	Construction/remodeling work at Celebrity Body Studio
07/03/2017	10/02/2017	Memphis Grizzlies	\$ 7,981.72	Game tickets, seats for other FedEx Forum events, space rental for children's concession business
07/24/2017	05/17/2018	MMIC/Malkin Management	\$ 11,200.00	Rent for Celebrity Body Studio
01/17/2018	06/13/2018	Great Lakes Student Loans	\$ 3,275.90	Payments on personal student loan
07/06/2017	09/06/2017	Butler, Sevier, Hinsley & Reid, PLLC	\$ 10,505.63	Legal fees for divorce
08/11/2017	09/29/2017	Daniel Foster	\$ 7,610.00	Construction/remodeling work at Celebrity Body Studio
09/12/2017	03/08/2018	MLGW	\$ 2,765.81	Utilities for Celebrity Body Studio
01/29/2018	N/A	Katrina Robinson	\$ 25,400.00	Performance payout, FY 2017
03/06/2018	06/11/2018	Ally Financial	\$ 1,766.33	Payments on 2016 Jeep Renegade
04/04/2018	N/A	Shelby County, Tennessee	\$ 46,163.09	Tax sale purchase of real property at 4422 Boeingshire Dr., Memphis, TN

04/10/2018	N/A	Pershing LLC	\$ 54,000.00	Personal Individual Retirement Account
07/01/2017	06/30/2018	Katrina Robinson	\$ 74,281.60	Salary in excess of amounts permitted under HRSA grant terms
07/17/2017	09/05/2017	At Home	\$ 802.45	Home furnishings and décor
08/30/2017	10/05/2017	Slim Spa Group	\$ 1,753.92	Spa supplies and equipment
09/07/2017	N/A	Imports of Memphis	\$ 3,514.90	Payment to used car dealer
09/29/2017	N/A	Southern Snow Sales	\$ 2,075.00	Snow cone supplies
12/22/2017	N/A	American Airlines	\$ 1,057.16	Airfare
05/29/2018	N/A	TPC Southwind	\$ 2,299.17	State Senate campaign event
08/30/2017	06/11/2018	Ross Stores	\$ 273.67	Clothing
11/17/2017	11/20/2017	Dillards	\$ 460.28	Clothing
		Total	\$ 295,970.98	

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNT 4
(Theft and Embezzlement Involving Government Programs)

The allegations in paragraphs 1-9 above are hereby realleged and incorporated by reference as if fully set forth herein.

Between on or about July 1, 2018 and June 30, 2019, in the Western District of Tennessee and elsewhere, the defendant

KATRINA ROBINSON

being an agent of an organization receiving benefits in excess of \$10,000 during the one-year period between July 1, 2015 and June 30, 2016 under the Geriatrics Workforce Enhancement Program administered by the U.S. Dept. of Health and Human Services,

Health Resources and Services Administration, embezzled, stole, obtained by fraud, knowingly converted without authority to the use of a person not the rightful owner, and intentionally misapplied property worth at least \$5,000 and owned by, and under the care, custody, and control of such organization, that is, United States funds in the amounts set forth below paid to the payees set forth below for the general purposes set forth below:

Begin Date	End Date	Payee	Amount	Description
07/12/2018	N/A	Lowe's Co.	\$ 243.50	Building supplies
08/15/2018	N/A	Best Buy	\$ 1,599.41	Electronics
08/29/2018	04/26/2019	Paypal	\$ 7,274.50	Clothing, shoes, hair/beauty products, spa supplies
07/02/2018	10/15/2018	Amazon.com, Inc.	\$ 2,039.19	Clothing, hair/beauty products, home theatre equipment
07/27/18	06/04/2019	MMIC/Malkin Management	\$ 13,500.00	Rent for Celebrity Body Studio
07/13/2018	06/13/2019	Great Lakes Student Loans	\$ 9,933.84	Payments on personal student loan
12/12/2018	N/A	Butler, Sevier, Hinsley & Reid PLLC	\$ 3,717.56	Legal fees for divorce
08/20/2018	06/21/2019	MLGW	\$ 2,037.52	Utilities for Celebrity Body Studio
07/11/2018	06/17/2019	Ally Financial	\$ 6,197.24	Payments on 2016 Jeep Renegade
12/20/2018	03/25/2019	Gardner Group & Co.	\$ 9,500.00	Renovation work for 4422 Boeingshire Dr.
09/28/2018	10/26/2018	Tuscan Iron Entries	\$ 5,528.16	Iron entry door for personal residence
07/01/2018	06/30/2019	Katrina Robinson	\$ 94,851.93	Salary in excess of amounts permitted under HRSA grant terms
07/09/2018	07/26/2018	LR Clothier	\$ 1,207.64	Clothing
10/12/2018	11/14/2018	ASOS	\$ 2,496.82	Clothing
01/07/2019	06/17/2019	Uber	\$ 373.87	Transportation
01/25/2019	06/07/2019	ADT Security	\$ 539.38	Security services for Celebrity Body Studio
10/22/2018	03/19/2019	Ross Stores	\$ 547.48	Clothing and home décor
12/10/2018	N/A	Dillards	\$ 300.44	Clothing

10/05/2018	N/A	Floor n Décor	\$ 780.50	Home flooring and furnishings
01/02/2019	N/A	At Home	\$ 125.34	Home furnishings and décor
09/06/2018	N/A	Slim Spa Group	\$ 1,875.00	Spa supplies and equipment
		Total	\$164,669.32	

All in violation of Title 18, United States Code, Section 666(a)(1)(A).

COUNTS 5-17
(Wire Fraud)

The allegations in paragraphs 1-9 above are hereby realleged and incorporated by reference as if fully set forth herein.

On or about the dates set forth below, in the Western District of Tennessee and elsewhere, the defendant

KATRINA ROBINSON

for the purpose of executing the scheme described in paragraphs 1-9 above, and attempting to do so, caused to be transmitted by means of wire communication in interstate commerce the signals and sounds constituting the financial transactions more particularly described in each count below:

Count	Date	Payee	Amount	Description
5	12/06/2016	Methodist Healthcare FCU	\$9,965.52	Check payment on personal loan
6	01/29/2018	Katrina Robinson	\$25,400.00	Check payment for performance payout, FY 2017
7	04/04/2018	Shelby County, Tennessee	\$46,163.09	ACH payment for tax sale purchase of real property at 4422 Boeingshire Dr., Memphis, TN
8	04/10/2018	Pershing, LLC	\$54,000.00	Check payment for personal Individual

				Retirement Account
9	08/04/2015	Carnival Cruise Lines	\$856.10	ACH payment for cruise
10	03/05/2016	One Main Financial	\$3,744.07	ACH payment for personal loan
11	04/02/2016	GP Entertainment	\$2,326.01	ACH payment to performing artist booking agency
12	06/21/2016	Facegyrl	\$1,158.05	Square electronic payment to wedding makeup artist
13	06/26/2016	Madison Hotel, Memphis	\$972.78	ACH payment for lodging
14	09/07/2017	Imports of Memphis	\$3,514.90	Check payment to used car dealer
15	09/29/2017	Southern Snow Sales	\$2,075.00	Credit card payment for snow cone supplies
16	12/22/2017	American Airlines	\$1,057.16	ACH payments for airfare
17	05/29/2018	TPC Southwind	\$2,299.17	ACH payment for State Senate campaign event

All in violation of Title 18 United States Code, Section 1343.

CRIMINAL FORFEITURE

1. The allegations contained in paragraphs 1-9 above and Counts 1-17 of this indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeitures pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

2. Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), upon conviction of an offense(s) in violation of Title 18 United States Code, Section 666 and/or 1343 the defendant, **KATRINA ROBINSON**, shall forfeit to the United States of America any property, real or personal, which

constitutes or is derived from proceeds traceable to the offense(s). The property to be forfeited includes, but is not limited to, the following:

a. Money Judgment: A personal money judgment representing the aggregate of the proceeds of the scheme to defraud alleged in paragraphs 1-9 and the offenses charged in Counts 1-17, that is, at least six hundred thousand dollars (\$600,000.00) in U.S. funds;

b. One parcel of real property located at 4422 Boeingshire Drive, Memphis, Tennessee, with all appurtenances and improvements thereon;

c. One 2016 Jeep Renegade, VIN ZACCJABT9GPD91905, with all appurtenances and attachments thereon;

d. All cash, mutual funds, stocks, bonds, securities, or other financial instruments on deposit or credited to Account Q6H-186404 at Waddell & Reed Financial Advisors (6300 Lamar Ave, Post Office Box 29217, Shawnee Mission KS), which clears through Pershing LLC, a wholly owned subsidiary of the Bank of New York Mellon Corp.

3. If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:

FOREPERSON

DATE: _____

D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 18, United States Code, Section 982(b)(1) and Title 28, United States Code, Section 2461(c).

A TRUE BILL:


FOREPERSON

DATE: 1/14/2021


D. MICHAEL DUNAVANT
UNITED STATES ATTORNEY